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31 **UNITED STATES DISTRICT COURT**
32 **NORTHERN DISTRICT OF CALIFORNIA**

33 CHASOM BROWN, WILLIAM BYATT,
34 JEREMY DAVIS, CHRISTOPHER
35 CASTILLO, and MONIQUE TRUJILLO
36 individually and on behalf of all other similarly
37 situated,

38 Plaintiffs,

39 v.

40 GOOGLE LLC,

41 Defendant.

42 CASE NO.: 4:20-cv-03664-YGR-SVK

43 **DECLARATION OF RYAN J. MCGEE IN
44 SUPPORT OF PLAINTIFFS' RESPONSE
45 IN OPPOSITION TO GOOGLE'S
46 MOTION FOR RELIEF REGARDING
47 PRESERVATION**

DECLARATION OF RYAN J. MCGEE

I, Ryan J. McGee, declare as follows:

1. I am an attorney with the law firm of Morgan & Morgan, P.A., counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of Florida. I have personal knowledge of the matters set forth herein and am competent to testify.

2. I submit this Declaration in support of Plaintiffs' Response in Opposition to Google's Motion for Relief Regarding Preservation.

3. I have been extensively involved in all aspects of this case, and particular to the present Motion before this Court, the discovery disputes and Special Master Process. With the exception of a few hearings and conferences that I was unable to attend for personal reasons, I have otherwise appeared at all discovery hearings this Court has held in this case and all conferences that Special Master Brush has held in this case.

4. I have carefully reviewed the productions from Google, and could not identify any productions where Google provided any mapping or linking tables for Plaintiffs' review. Instead, when Plaintiffs provided an identifier to Google and requested particular mapped or linked identifiers associated with the original identifier, Google would search for then return any mapped or linked identifiers to Plaintiffs under the guidance of Special Master Brush. No other details were shared with Plaintiffs.

5. I am not aware of Google submitting any mapping or linking tables for Special Master Brush's review, and I am not aware of Special Master Brush informing the parties that he had been provided any mapping or linking tables from Google.

6. Attached hereto as **Exhibit 1** are true and accurate experts from the transcript of the December 3, 2021 deposition of Chris Liao.

7. Attached hereto as **Exhibit 2** is a true and accurate copy of a document Google provided to Special Master Brush and Plaintiffs describing the field names for one of Google's data sources that was identified during the Special Master Process.

8. Attached hereto as **Exhibit 3** is a true and accurate copy of a document Google provided to Special Master Brush and Plaintiffs describing the filed names for one of Google's data sources that was identified during the Special Master Process.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 1st day of December, 2022, at Tampa, Florida.

/s/ Ryan J. McGee

Ryan J. McGee